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June 8, 2005

Mr. Charles L. A. Terreni
Chief Clerk/Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210

**Re: Petition of MCI metro Access Transmission Services, LLC for Arbitration
of Certain Terms and Conditions of Proposed Agreement with Farmers
Telephone Cooperative, Inc., Home Telephone Company, Inc., PBT
Telecom, Inc., and Hargray Telephone Company, Concerning
Interconnection and Resale under the Telecommunications Act of 1996
Docket No. 2005-67-C**

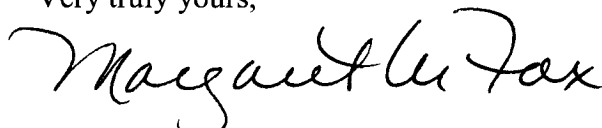
Dear Mr. Terreni:

Enclosed for filing in the above-referenced matter please find an original and ten (10) copies of a Joint Motion Regarding Procedure. By copy of this letter, all parties of record will receive a copy of the Joint Motion via U. S. Mail.

Please clock in a copy of the Joint Motion and return it with our courier.

Thank you for your assistance.

Very truly yours,


Margaret M. Fox

MMF/rwm
Enclosures

cc: Parties of Record

BEFORE THE
PUBLIC SERVICE COMMISSION of
SOUTH CAROLINA
DOCKET NO. 2005-67-C

In Re: Petition of MCImetro Access Transmission)
Services, LLC for Arbitration of Certain Terms)
and Conditions of Proposed Agreement with)
Farmers Telephone Cooperative, Inc., Home)
Telephone Co., Inc., PBT Telecom, Inc., and)
Hargray Telephone Company, Concerning)
Interconnection and Resale under the)
Telecommunications Act of 1996)
_____)

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JOINT MOTION REGARDING PROCEDURE

Farmers Telephone Cooperative, Inc., Hargray Telephone Company, Home Telephone Company, Inc., and PBT Telecom, Inc. (the “RLECs”) and MCImetro Access Transmission Services, LLC (“MCI”) respectfully and jointly submit this Motion regarding procedural matters in the above-captioned proceeding. The Office of Regulatory Staff does not oppose this motion and concurs in the requests made herein.

A. Motion to Extend the Timeframe for Resolving the Unresolved Issues.

For the reasons stated herein, the parties request that the Commission extend the timeframe for resolving the unresolved issues in this docket for two months, from July 8, 2005 to on or about September 8, 2005. This request is made on the following grounds:

1. Section 252(b)(4)(C) of the Communications Act of 1934, as amended (“the Act”) provides that the Commission “shall conclude the resolution of any unresolved issues not later than 9 months after the date on which the local exchange carrier received the

request under this section.” The Commission has previously found that date to be July 8, 2005. See Order No. 2005-167 at p. 2. However, the deadline established by the Act exists for the benefit of the parties, and the only consequence for non-compliance with the deadline is that a party may go to the Federal Communications Commission (“FCC”) for resolution. In this case, the parties agree to the extended timeframe and further agree that they will waive (1) their right to petition the FCC under Section 252(e)(5) for a failure to act by the Commission within the statutory deadline, and (2) their right to raise the failure to act within the statutory deadline on any appeal, if the Motion is granted.

2. Consistent with this Commission’s recent prior precedent in Docket No. 2005-57-C, the Commission may allow a waiver of the application of the nine-month deadline set forth in Section 252(a)(4)(C) of the Act, when the parties have mutually agreed and requested that the Commission do so.

3. Granting the proposed waiver would be in the best interest of all parties and the Commission, because it would allow adequate time for the parties to file post-hearing briefs and proposed orders and for the Commission to deliberate this matter.

B. Motion to Eliminate Requirement to File Briefs and/or Proposed Orders Prior to the Hearing.

For the reasons stated herein, the parties request that the Commission eliminate the requirement to file briefs and/or proposed orders prior to the hearing. Instead, the parties request that the Commission allow the parties to file Post-Hearing Briefs and/or Proposed Orders 30 days following the date the transcript of the hearing is made available. This request is made on the following grounds:

1. Preparation and filing of briefs and/or proposed orders prior to the hearing would hinder the parties' ability to devote scarce time and resources to negotiating resolutions to issues prior to the proceeding, hearing preparation and narrowing the issues.

2. It is customary in Commission proceedings to file briefs and proposed orders after the hearing. Proposed orders in particular generally describe the testimony and evidence received at the hearing, as well as motions and arguments made at the hearing, and would have more significance and relevance to the Commission if they are created after the hearing.

C. Motion to Adopt Modified Procedure for Conduct of Hearing.

The parties have agreed to respectfully request that the Commission adopt the following modifications to the procedure for the conduct of the hearing in this docket that was previously described in Commission Order No. 2005-167:

1. At the beginning of the hearing, each witness will have the opportunity to present an overall summary of his or her testimony, subject to a limitation of 15 minutes per witness. When the examination of the witnesses on an issue-by-issue basis begins, the witness(es) for each side may present a summary of the issue being addressed, subject to a limitation of 2 minutes per side per issue. In the event the parties mutually agree to group issues together for discussion purposes, the limit will be based on the number of issues that are grouped together (e.g., if 4 issues are grouped together, each side may present a summary not to exceed 8 minutes in length regarding that group of issues).

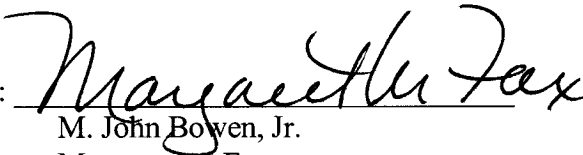
2. Following the presentation of a witness's summary of the issue being addressed, the witness will be subject to cross-examination by the ORS.

3. Following the ORS's cross-examination, the witness will be subject to questions from the Commission.

4. Following questions from the Commission, the witness will be subject to cross-examination by the remaining party.

WHEREFORE, the parties respectfully request that the Commission grant this Joint Motion Regarding Procedure, as described herein, and grant such other and further relief as is just and proper.

Respectfully submitted this 8th day of June, 2005.

By: 
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